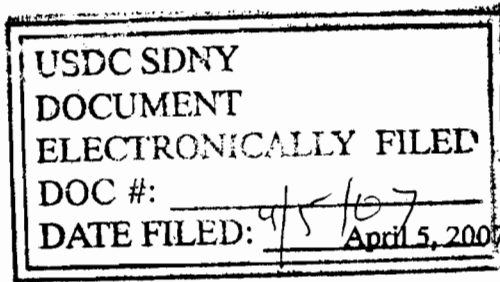


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AFFILIATE OFFICES
MUMBAI, INDIA

101 PARK AVENUE
NEW YORK, NEW YORK 10178
(212) 808-7800

FACSIMILE
(212) 808-7897
www.kelleydrye.com



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DIRECT LINE: (212) 808-8019
EMAIL: jpark@kelleydrye.com

VIA FACSIMILE (212) 805-7912

Honorable John G. Koeltl
United States District Judge
United States District Court
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

APPLICATION GRANTED
SO ORDERED

[Signature]
John G. Koeltl, U.S.D.J.

Re: Lindner v. American Express Corporation
Civil Action No. 06-03834 (JGK-THK)

Dear Judge Koeltl:

As you know, my firm represents Defendants, American Express Travel Related Services Company, Inc. and Qing Lin, in the above-referenced matter.

On March 29th, the parties appeared before Magistrate Katz for a settlement conference. After protracted negotiations, a settlement was reached. The material terms of the settlement were recited and recorded in open court before Magistrate Katz.

The following morning, plaintiff, Peter Lindner, advised the Company that he was not going to go through with the settlement and that he had changed his mind. Mr. Lindner has since taken action in direct contravention of the agreements reached in open court.

Defendants are preparing their motion to enforce the settlement agreement. In order to preserve the confidentiality of the terms of such agreement, we respectfully request leave to file the motion under seal. Plaintiff's counsel, Thomas J. Luz, Esq., consents to this application.

Respectfully submitted,

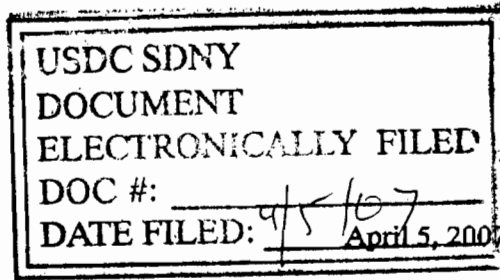
[Signature]
Jean Y. Park (JYP-8073)

cc: Thomas J. Luz, Esq., Pearce & Luz LLP
Attorneys for Plaintiff (via facsimile (212) 221-8468)

WASHINGTON, DC
TYSONS CORNER, VA
CHICAGO, IL
STAMFORD, CT
PARIS, FRANCE
BRUSSELS, BELGIUM
AFFILIATE OFFICES
MUMBAI, INDIA

101 PARK AVENUE
NEW YORK, NEW YORK 10178
(212) 808-7800

FACSIMILE
(212) 808-7807
www.kelleydrye.com



APR - 5 2007
DIRECT LINE: (212) 808-8019
EMAIL: jpark@kelleydrye.com

VIA FACSIMILE (212) 805-7912

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Respectfully submitted,

[Signature]
Jean Y. Park (JYP-8073)

cc: Thomas J. Luz, Esq., Pearce & Luz LLP
Attorneys for Plaintiff (via facsimile (212) 221-8468)